

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

McMANIMON, SCOTLAND & BAUMANN, LLC

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Counsel to Daryl Fred Heller

Chapter 11 Debtor and Debtor-in-Possession

In re:

DARYL FRED HELLER,

Debtor.

Case No. 25-11354 (JNP)

Chapter 11

**SUPPLEMENTAL CERTIFICATION IN SUPPORT OF APPLICATION
FOR RETENTION AS COUNSEL TO DEBTOR AND DEBTOR-IN-
POSSESSION**

I, SARI B. PLACONA, being of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and a partner of the law firm of

McManimon, Scotland & Baumann, LLC (“MSB”).

2. On February 11, 2025, by application, Daryl Fred Heller, Chapter 11 Debtor and Debtor-in-Possession (the “Debtor”), sought to retain MSB as counsel to the Debtor (the “Application”). [Doc No. 7]

3. On March 31, 2025, the Court entered an order authorizing the Application for the Debtor to employ MSB as counsel. [Doc. No. 138]

4. I hereby submit this Supplement Certification in further support of the Application to include the services to be rendered to the Debtor as counsel to the following non-dischargeability adversary proceedings:

25-1199 Prestige Fund v Heller

25-1202 Silverview Credit Partners v Heller

25-1205	Hostetter v Heller
25-1206	Hostetter Family Trust v Heller
25-1207	Poole v Heller
25-1208	Summit Asset Management v Heller
25-1209	Pinnacle Asset Management v Heller
25-1210	Zook v Heller
25-1211	Deerfield Capital v Heller
25-1212	Reliance Financial v Heller
25-1213	Karen Parreira 2023 Irrevocable Trust v Heller
25-1214	Funders App v Heller
25-1216	Steward Capital Holdings v Heller
25-1217	Libertas Funding v Heller
25-1218	WebBank v Heller (collectively, the “Adversary Actions”)

5. In connection with the Adversary Actions, MSB did not receive a separate retainer.

MSB believes defending the Debtor in the Adversary Actions is a benefit to the estate. If the Debtor is successful in defending the Adversary Actions, it will provide a pathway for a feasible plan of reorganization. It is much more likely that a successful defense of the Adversary Actions will provide the Debtor the ability to confirm and meet his obligations under a confirmed plan. The Debtor’s ability to meet his obligations under a confirmed plan will benefit the estate and creditors. Should the Debtor not have counsel to defend the Adversary Actions, he will most likely not have the debts discharged which will make it difficult, if not impossible, for him to confirm a feasible plan.

I certify under penalty of perjury that the above information is true.

**McMANIMON, SCOTLAND &
BAUMANN, LLC**

Dated: July 22, 2025

By: /s/ Sari B. Placona
Sari B. Placona